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June 14, 2019

VIA CM/ECF

Hon. Naomi Reice Buchwald, U.S.D.J. United States District Court for the Southern District of New York Daniel Patrick Moynihan U.S. Courthouse 500 Pearl Street New York, NY 10007-1312

Caiola v. Maisonneuve et al., No. 1:18-cv-11646-NRB Re: Maisonneuve v. Caiola, No. 19-cv-02567-NRB

Dear Judge Buchwald:

The parties jointly submit this letter pursuant to the Court's May 21, 2019 Order (ECF No. 32).

Counsel have continued to meet and confer on their respective accountings and a proposed Term Sheet embodying a potential settlement.

This week, Mr. Benedict Caiola substituted his prior counsel, Robert Whitman of Mischon de Ray New York LLP, with Gary M. Fellner of Porzio Bromberg & Newman P.C. This morning the undersigned spoke to Mr. Fellner and we have agreed to allow Mr. Fellner two weeks to become familiar with the issues in the two pending actions and to continue to discuss possible settlement.

Accordingly, the parties respectfully propose to provide another written status report on July 1, 2019, with a tentative status conference to be held after that date. San Deci Dechuas 6/17/19

Very truly yours, /s/Ryan J. Cooper Ryan J. Cooper

CC:

All Counsel of Record